

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL D. COHEN,

Case No.: 21-cv-10774 (LJL)(GWG)

Plaintiff,

-against-

UNITED STATES OF AMERICA,  
DONALD J. TRUMP, former President of  
the United States, WILLIAM BARR, former  
Attorney General of the United States, MICHAEL  
CARVAJAL, Director of the Bureau of Prisons,  
JON GUSTIN, Administrator of the Residential  
Reentry Management Branch of the Bureau of Prisons,  
PATRICK McFARLAND, Residential Reentry  
Manager of the Federal Bureau of Prisons,  
JAMES PETRUCCI, Warden of FCI Otisville,  
ENID FEBUS, Supervisory Probation Officer  
of the United States Probation and Pretrial Services  
ADAM PAKULA, Probation Officer of the  
United States Probation and Pretrial Services,  
and JOHN and JANE DOE (1-10) agents, servants,  
and employees of the United States,

Defendants.

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**DECLARATION OF ANDREW C. LAUFER**

Andrew C. Laufer, pursuant to the provisions of 28 U.S.C. sec. 1746, declares under penalties of perjury, as follows:

1. I am the principal of the Law Office of Andrew C. Laufer, PLLC, attorney for the Plaintiff MICHAEL D. COHEN. I am familiar with the proceedings herein. I submit the declaration in support of plaintiff's cross-motion to compel discovery and in opposition to defendants motion for a stay of discovery.

2. Attached hereto as Exhibit A is Defendant Trump's Rule 26(a) response of April 18, 2022.

3. Attached hereto as Exhibit B is the decision of the Honorable Alvin K. Hellerstein,  
U.S.D.J. of July 23, 2020.

Dated: New York, New York  
May 17, 2022

**LAW OFFICE OF  
ANDREW C. LAUFER, PLLC**



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By: Andrew C. Laufer  
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**LAW OFFICES OF  
JEFFREY K. LEVINE**

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By: Jeffrey K. Levine, Esq.  
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